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UNITED STATES DISTRICT COURT
 [NORTHERN] DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY, NEVADA; WASHOE
 COUNTY LIBRARY SYSTEM; BUILD OUR
 CENTER, INC.; JEFF SCOTT; STACY
 MCKENZIE; JONNICA BOWEN; LIBRARY
 EMPLOYEE DOE # 1; JENNIFER COLE;
 DEPUTY C. ROTHKIN (Badge No. 4696);
 DEPUTY R. SAPIDA (Badge No. 4663);
 SGT. GEORGE GOMEZ (Badge No. 4066);
 and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT
 BUILD OUR CENTER'S
 OPPOSITION TO PLAINTIFF'S
 MOTION FOR LEAVE TO FILE
 LATE OPPOSITION AND
 CONSOLIDATED OPPOSITION TO
 DEFENDANTS' OPPOSITION TO
 MOTION FOR LEAVE TO FILE
 FIRST AMENDED COMPLAINT**

Defendant BUILD OUR CENTER INC., by and through its undersigned
 counsel, respectfully requests the Court deny *Plaintiff's Motion for Leave to File
 Late Opposition and Consolidated Opposition to Defendants' Opposition to Motion
 for Leave to File First Amended Complaint*. [ECF 81.]

This Opposition is made and based upon all pleadings and records on file
 herein together with every exhibit attached hereto (each of which is incorporated
 herein by this reference), as well as the points and authorities set forth directly
 below.

INTRODUCTION

Plaintiff Drew Ribar's ("Mr. Ribar") *Motion and "Consolidated Opposition"*
 [ECF 81] appears to request (1) an extension to reply to Build Our Center's
Opposition to Plaintiff's Motion for Leave to File First Amended Complaint [ECF 76]

1 and (2) despite requesting an extension, presents his reply in support of his
 2 *Motion for Leave to File First Amended Complaint*. The Court should deny Mr.
 3 Ribar's request for an extension to file his reply because (1) he was already
 4 granted an extension that ran on April 22, 2025; (2) he filed his reply; and (3)
 5 good cause does not appear to grant an extension to file a supplemental reply.

6 The Court should deny Mr. Ribar's Motion because he was already granted
 7 an extension to file a reply in support of his *Motion for Leave to File First Amended*
 8 *Complaint*. [ECF 80.] His document (although unclear) appears to do the very
 9 thing for which he requested leave for an extension – he provided his reply in
 10 support of his *Motion*. Further, the Court should deny Mr. Ribar's *Motion* based
 11 on his clear ability to draft legal documents, appear in court, participate in
 12 discovery, and attend public hearings and meetings.¹

13 **LEGAL ARGUMENT**

14 Candidly, Mr. Ribar's claim he was in a motor vehicle accident that has
 15 caused him an inability to draft legal documents is unpersuasive. He claims the
 16 accident occurred on March 19, 2025, and did not seek medical attention until
 17 March 20, 2025. (ECF 77 at p. 1-2). However, he was able to draft and file his
 18 *Motion for Leave to File First Amended Complaint* [ECF 65] on March 24, 2025,
 19 with no apparent medical issues. Build Our Center is also aware, upon
 20 information and belief, that Mr. Ribar attended a Washoe County Library public
 21 meeting immediately after his alleged car accident.² See [YouTube clip at 1:59:00](#).

22 ¹ Build Our Center reminds Mr. Ribar the Court has already instructed that the parties,
 23 including those proceeding *pro se* "are required to follow the Federal Rules of Civil
 24 Procedure and the Local Rules. *Carter v. Comm'r of Internal Revenue*, 784 F.2d 1006,
 25 1008 (9th Cir. 1986) ("Although *pro se* [plaintiff] is expected to abide by the rules of
 26 the court in which he litigates."). Plaintiff is also cautioned that failure to comply with
 27 the Federal Rules of Civil Procedure, the Local Rules of this District, and the orders of
 28 this court may result in future filings being denied or stricken. *Carter*, 784 F.2d at
 1008-09) (explaining that a *pro se* litigant is "expected to abide by the rules of the
 court in which he litigates"). Although the court will liberally construe *pro se* pleadings
 and will give some latitude to *pro se* litigants, a continued failure to follow the court's
 Local Rules and the Rules of Civil Procedure may result in sanctions." (ECF 88).

² See Washoe County Library System's YouTube Video, dated March 19, 2025, at

1 In the video, Mr. Ribar presents arguments to the Washoe County Library
 2 Board of Trustees and has no cognitive issues that preclude him from engaging
 3 in public activities or formulating legal argument. He also states in this video
 4 that he was late to the meeting (which he later confirmed was because of his
 5 accident (confirmed in statements he made to this Court on April 28, 2025)).³

6 Build Our Center is sympathetic to Mr. Ribar's personal injury, but he was
 7 able to draft and file the *Plaintiff's Motion for Extension of Time to File Reply in*
 8 *Support of Motion for Leave to File First Amended Complaint and Request for*
 9 *Expedited Consideration* [ECF 77], and he was already granted an extension.
 10 [ECF 80.] Further, Mr. Ribar has exhibited no signs of cognitive impairment from
 11 his motor vehicle accident as he meaningfully participated in oral argument
 12 before this Court on April 28, 2025. [ECF 89.]

13 Ultimately, Build Our Center is concerned that permitting Mr. Ribar an
 14 additional extension to file a reply in support of his own motion is a tactic aimed
 15 at fabricating information to add to his proposed amended complaint –
 16 information that he has likely had since the inception of this lawsuit. See ECF
 17 74 and 76. He has shown that he is able to participate in litigation, discovery,
 18 hearings, and other public events. For example, Mr. Ribar has continued to
 19 stream live videos on his YouTube channel where he sits for extended periods of
 20 time, attends public meetings, and presents arguments. In these live streams,
 21 he has no apparent cognitive defects. Indeed, his live streams show he has the
 22 ability to create computer content. See "[Library Director Job on the line??](https://www.youtube.com/watch?v=fs-3RCd0vas&t=7134s),"
 23 (wherein Mr. Ribar livestreams a three hour public meeting April 16, 2025, and
 24 where he presented argument to the Library Board of Trustees showing no signs
 25 / / /

26 <https://www.youtube.com/watch?v=fs-3RCd0vas&t=7134s> (hour mark 1:59:00).

27 ³ Build Our Center has requested a transcript of the April 28, 2025, meeting and will
 28 file it once it is received.

of personal injury or cognitive impairment);⁴ See also “[Retired Sheriff Exposes Corruption](#)” posted on May 4, 2025 (wherein Mr. Ribar livestreams an interview and, likewise, shows no cognitive impairment or inability to prepare content on a computer.)⁵

CONCLUSION

For the foregoing reasons, Build Our Center respectfully requests the Court to deny Mr. Ribar’s *Plaintiff’s Motion for Leave to File Late Opposition and Consolidated Opposition to Defendants’ Opposition to Motion for Leave to File First Amended Complaint*. [ECF 81.]

DATED May 6, 2025.

SIERRA CREST BUSINESS LAW GROUP

By:



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Counsel for Defendant BUILD OUR CENTER

⁴ See “Auditing Reno 911’s” YouTube Livestream at https://www.youtube.com/watch?v=8WUy03x7_b8

⁵ See “Auditing Reno 911’s” YouTube Livestream at <https://www.youtube.com/watch?v=c5k9W4JT12Y>

CERTIFICATE OF SERVICE

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

Drew Ribar

480 Pershing Lane, Washoe Valley, NV 89704
(775) 223-7899
const2audit@gmail.com
Plaintiff in propria persona

Lindsay L. Liddell (SBN 14079)

Andrew Cobi Burnett (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

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(775) 337-5700

Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez

DATED: May 6, 2025.

/s/ Mayra Ibarra

an employee of the
SIERRA CREST BUSINESS LAW GROUP

INDEX OF EXHIBITS

to

DEFENDANT BUILD OUR CENTER’S OPPOSITION TO
PLAINTIFF’S MOTION FOR LEAVE TO FILE LATE OPPOSITION
AND CONSOLIDATED OPPOSITION TO DEFENDANTS’ OPPOSITION TO
MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

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Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
	None,	
	Not applicable.	